



Re: FW: FW: Woodbrook Road, key revised SLERA text

Diane Salkie to: Hansen, Patrick (Philadelphia, PA-US)

01/25/2012 04:33 PM

Cc: "Goeller, Arthur (Millburn,NJ-US)", John Prince, "Heim, Scott (Lowell,MA-US)", Mindy Pensak

PJ,

EPA accepts the PRG analysis and the equation used for the calculations and would appreciate inclusion of the following into the SLERA amendment:

Please provide additional information in a table to ensure transparency in understanding how the PRGs were calculated. Specifically, although it is understood that the HQ is set to "1" and a soil or sediment PRG associated with that HQ of "1" is then derived, it would be useful to put this new sediment concentration into the first column of the tables (Mean UCL sediment concentration), and then (for example, using Table 6-13) show how the aquatic invertebrate concentration is calculated. There should be an additional column added to the table that shows the threshold effect level for aquatic invertebrates (concentrations which invertebrate concentrations were compared to, to derive the HQ). It is recommended that new tables be developed for each of the receptors modeled, along with the fish tissue so that it is clearly shown how the PRGs derived for sediment or soil, result in a HQ of "1" for each receptor.

If you would like to discuss this further, please let me know and we can set up a call.

Thanks,
Diane Salkie
Remedial Project Manager
EPA Region 2 NJRB
290 Broadway
New York, NY 10007
212-637-4370

"Hansen, Patrick (Philadelphia, PA-US)"

Diane and John, Thanks f...

12/23/2011 08:18:29 AM

From: "Hansen, Patrick (Philadelphia, PA-US)" <PHansen@trcsolutions.com>
To: Diane Salkie/R2/USEPA/US@EPA, John Prince/R2/USEPA/US@EPA
Cc: "Heim, Scott (Lowell,MA-US)" <SHeim@trcsolutions.com>, "Goeller, Arthur (Millburn,NJ-US)" <AGoeller@trcsolutions.com>
Date: 12/23/2011 08:18 AM
Subject: FW: FW: Woodbrook Road, key revised SLERA text

Diane and John,

Thanks for furthering the SLERA work via discussions with your group!

In response to your email inquiry, please find attached the tables that you recommended.

As our eco risk assessor notes below, there is no table for the back-calculation of the PRGs, since these calcs were accomplished by "trial and error". This is discussed in the text somewhat, but, basically, Scott would iteratively adjust values in the table until the risk resulted in the appropriate number.

Please let us know if you have further questions, or would like to discuss the project.

Happy holidays!

PJ

From: Heim, Scott (Lowell,MA-US)
Sent: Thursday, December 22, 2011 5:18 PM
To: Hansen, Patrick (Philadelphia, PA-US); Goeller, Arthur (Millburn,NJ-US)
Subject: RE: FW: Woodbrook Road, key revised SLERA text

PJ,

Enclosed are the requested tables (6-13, 6-14 and 6-16 thru 6-18). Note that there isn't a table that shows the back calculations to derive the values provided in Tables 7-2 and 7-3. As indicated in the text, values for sediment total PCB concentrations were substituted into tables 6-13 and 6-14 to calculate aquatic invertebrate and fish PCB congener concentrations. These values (and the sediment values) were then copied into the individual receptor tables (6-16 thru 6-18) to present an overall total PCB congener exposure dose. If this dose was higher than the TRV, then a lower total PCB sediment concentration was selected and the process repeated. An additional complication is that the ratio of individual PCB/dioxin/furan congeners to total PCBs was used to calculate the individual congener sediment concentrations. Tables 6-13 and 6-14 provide these ratios (hidden column B). To change the sediment concentrations, the number multiplied by column B is changed each time in the column C equation. There is no formula that a non-mathematician such as myself could create that would provide an easy computation. It is strictly a trial-and-error approach. This same approach was taken for the Western Dumping Area surface soils. EPA didn't request the tables used to calculate the soil PRGs but I can provide if requested.

I've also enclosed figures depicting the samples where total PCBs were detected above the PRGs for the Western Pond and Western Dumping Area. The Western Dumping Area remediation areas also include samples where other COPECs were detected above PRGs.

I will be back in the office next Tuesday if you wish to discuss or clarify. Have a nice, long, holiday weekend.

Scott Heim
Senior Ecologist



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From: Diane Salkie [<mailto:Salkie.Diane@epamail.epa.gov>]
Sent: Thursday, December 22, 2011 3:07 PM
To: Hansen, Patrick (Philadelphia, PA-US)
Cc: John Prince; Mindy Pensak
Subject: Re: FW: Woodbrook Road, key revised SLERA text

Hello PJ

We would be happy to have a conference call with you about the PRG analysis but it looks like it will be after the holidays. We are going to need a few things from you to complete the review this document:

- A Table showing the back calculations used to produce Tables 7-2 and 7-3; also please include the formula used.
- It would be helpful to have Tables 6-13, 6-14 and 6-16 through 6-18 that are referred to on page 1

- of the PRG analysis text.
- Finally, a figure demonstrating Western Pond and Western Dumping Area PRG exceedances.

Please let me know if you have any questions.

Happy Holidays,
Diane Salkie
Remedial Project Manager
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290 Broadway
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From: "Hansen, Patrick (Philadelphia, PA-US)" <PHansen@trcsolutions.com>
To: Diane Salkie/R2/USEPA/US@EPA
Date: 12/20/2011 06:48 AM
Subject: FW: Woodbrook Road, key revised SLERA text

Morning Diane.

Would we be able to have a conference call with you and Mindy regarding our SLERA language before the holidays?

If we can concur, we'd like to get the SLERA completed.

Thanks!

PJ

From: Hansen, Patrick (Philadelphia, PA-US)
Sent: Friday, December 09, 2011 3:05 PM
To: Heim, Scott (Lowell,MA-US); 'Salkie.Diane@epamail.epa.gov'; Pensak.Mindy@epamail.epa.gov
Cc: Prince.John@epamail.epa.gov
Subject: Woodbrook Road, key revised SLERA text

Afternoon folks,

Thanks again for the SLERA comments, and the useful discussions that followed.

TRC has performed the ecological PRG analysis. We wanted to send along the PRG writeup (Scott please forward the appropriate tables as well), and recommendations that came from the PRG development. We recognize that including the PRGs in the SLERA is a unique approach, utilized to expedite the project, and felt that providing the EPA a look at this "key" text was the best way to communicate and finalize the SLERA in a timely fashion.

Please review and let us know your thoughts. We'd be happy to have a conference call, once you have had a chance to review.

Regards,
PJ

Patrick J. Hansen, PE
Vice President

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For further information, please contact the EPA Call Center at
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

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"WesternPond_RemediationAreas.pdf" deleted by Diane Salkie/R2/USEPA/US]
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